

## **AFFIDAVIT**

I, Syed Bilal, declare under the penalty of perjury that the following is true and correct to the best of my recollection, knowledge and belief.

1. I am a U.S. Citizen and resident of Garland, Texas. I am the Chairman and Chief Operating Officer of Gillani Inc.
2. I am not a relative or friend of Dr. Aafia Siddiqui or members of her family. Prior to reading about her case in media reports in 2008, I had never heard of Aafia Siddiqui or the case against her.
3. On or about April 20, 2010, I was invited to attend a social gathering at the private residence of a friend, Samir Iqbal. Present at the social gathering were myself, Mr. Iqbal and another individual. That individual was introduced to me as Imran Shaukat.
4. Mr. Iqbal explained that he had known Mr. Shaukat for years as the two had served in the Pakistani Navy together. Mr. Shaukat stated he was the Superintendent of Police for Sindh Providence, stationed in Karachi, Pakistan. Mr. Shaukat had a very light complexion, appeared to be in his late 30s. He spoke in Punjabi, Urdu and English.
5. Over the course of the evening, Mr. Shaukat began discussing his work. He explained that he had been involved in several high-profile arrests of alleged terrorism suspects in Pakistan. He was in the United States, he told me, to attend meetings and seminars with law enforcement agencies including the FBI and the local police in several cities.
6. Mr. Shaukat told many stories about the arrests. He said that several of the people he arrested were detained at Guantanamo Bay, Cuba. Mr. Shaukat also described, in general terms, how his office interacted with U.S. intelligence agencies including the U.S. military, the CIA and the FBI.
7. Mr. Shaukat related in a matter-of-fact manner that after the arrest of a terrorism suspect the Pakistani police had, on more than one occasion, fabricating evidence

against Pakistani citizens. This was done, he said, at the behest of the United States government. Mr. Shaukat also explained to me how the CIA would take the names and fingerprints of individuals detained in Pakistani custody and mentioned specific cases in which individuals in Pakistani custody had been framed by Pakistani security forces in order to cover up ISI covert operations.

8. One of the cases Mr. Shaukat mentioned that evening was the case of Dr. Aafia Siddiqui. This heightened my attention because that case is well-known among Pakistanis inside the United States as well as Pakistan. I had also done some volunteer work to help raise awareness of her case.
9. Mr. Shaukat said that he had personally been involved in the arrest of Dr. Aafia Siddiqui and her children in 2003. Mr. Shaukat said that Dr. Siddiqui had been picked up by local authorities at the request of the FBI and, that after she was taken into custody, she was turned over to the ISI and to American agencies.
10. I was shocked when I heard this. When I got home that night, I grew increasingly troubled by what I had heard and decided that I had to come forward with what I knew if it could help people who had been unjustly imprisoned or framed.
11. The next day, on or about April 21, 2010, I was invited to visit the Mr. Iqbal's residence again. I decided to attend and to try and record any conversation with Mr. Shaukat, hoping that he would repeat the statements from the previous night.
12. Before heading over to Mr. Iqbal's residence that evening, I purchased a small digital audio recorder, which I kept in my pocket. Just before I arrived I turned on the recorder. When I went inside that Imran Shaukat was one of the people present. I kept the recording device on throughout the evening.
13. Over the course of the evening, we ate dinner and played cards. Mr. Shaukat repeated some of the statements that he had made the previous evening. I did not turn the recording off until I left and arrived at my residence. The recording is approximately four hours long.

14. I next reached out to Aafia Siddiqui's family. They put me in touch with Tina Foster, Esq. I told Ms. Foster what I had heard Shaukat say and about the recording.

15. Ms. Foster asked me for a copy of the recording. I told her that I wished to consult an attorney and get advice about how to proceed. After doing so I did provide Ms. Foster with a copy. The copy I gave her was a full and accurate copy of the original.

16. I have listened to it several times and am able to identify the voices of the host, myself, some of the guests and Mr. Shaukat.

17. At some point later on, Ms. Foster gave me a transcript of the recording I reviewed that transcript, a copy of which is attached to this affidavit, and compared it to the original recording. It is a true and accurate transcript of the conversation I recorded on or about April 21, 2010 that concerned Shaukat's Activities in Pakistan and his 2003 arrest of Aafia Siddiqui.

Dated: MAY 6, 2014



BILAL SYED

